

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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**ROSE BUCHHOLZ**, individually  
and on behalf of all others similarly situated,

Plaintiff,

vs.

**CONCORD RESOLUTION, INC.**, a  
New York corporation C,

Defendant.

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**NOTICE OF MOTION**

No.: 1:16-cv-00169-LJV

**PLEASE TAKE NOTICE** that upon the Affidavit of Alexander J. Douglas, sworn to on April 22, 2016, and the accompanying Memorandum of Law, Plaintiff Rose Buchholz, by its attorneys, Gesund & Pailet, LLC, will move this Court at the United States Courthouse, 100 State Street, on a date and at a time to be determined by the Court, for leave to proceed with discovery of her class claims, pursuant to Fed. R. Civ. P. 26(d).

**PLEASE TAKE FURTHER NOTICE** that, in accordance with Local Rule 7(a)(1), Rose Buchholz intends to file and serve reply papers and that any opposing papers must be filed and served at least eight (8) business days prior to the aforementioned return date.

Dated: Rochester, New York  
April 22, 2016

Respectfully Submitted,

**GESUND & PAILET, LLC**  
/s/ Alexander J. Douglas

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